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December 15, 2021

VIA ECF

Hon. Analisa Torres
United States District Court
Southern District of New York
500 Pearl Street
Room 1960
New York, NY 10007

Re: *Topsy Nail Club LLC, et al. v. ClassPass Inc. et al.*,
Case No. 21-cv-08662 (AT) (SN)

Dear Judge Torres:

We represent Defendants in the above-referenced action and write with the consent of Plaintiffs regarding the upcoming initial deadlines in this case and hereby jointly request revisions to the schedule as detailed below. As an initial matter, pursuant to the Court's Individual Practices in Civil Cases, the following are the current deadlines:

- Responsive pleading deadline: December 20, 2021 (as to ClassPass, LLC) and January 4, 2021 (as to ClassPass, Inc. and the two individual Defendants);
- Parties' joint submission of a case management plan: December 21, 2021;
- Federal Rule of Civil Procedure 16 Letter: December 21, 2021;
- Magistrate Judge Consent Letter: December 21, 2021.

In light of the filing of Plaintiffs' First Amended Complaint on November 23, 2021 (Dkt. 21) and in order to allow Defendants sufficient time to respond to the allegations therein, the Parties have conferred and with the Court's permission, wish to extend the above deadlines to the following dates:

- Responsive pleading deadline: **February 7, 2022**;

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- Parties' joint submission of a case management plan: **February 14, 2022**;
- Federal Rule of Civil Procedure 16 Letter: **February 14, 2022**;
- Magistrate Judge Consent Letter: **February 14, 2022**.

Further, the Parties have agreed that all Defendants be subject to the same February 7, 2022 responsive pleading deadline.

This is the first request for an extension in this case and all Parties consent to the above proposed extensions. Accordingly, the Parties respectfully request that the Court grant this request to amend the case schedule to reflect the above changes.

Respectfully submitted,

/s/ Dale M. Cendali

Dale M. Cendali, P.C.

GRANTED.

SO ORDERED.

Dated: December 16, 2021
New York, New York



ANALISA TORRES
United States District Judge